

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF MARYLAND
(Greenbelt Division)**

In re:

Ernest L. Hollins, Jr.
Appeakrong Boakye,

Debtors

Case No.: 23-18435-MCR
Chapter 13

DEBTORS' RESPONSE TO CHAPTER 13 TRUSTEE'S MOTION TO DISMISS

Ernest L. Hollins, Jr. and Appeakrong Boakye (“Debtors”), by undersigned counsel and pursuant to 11 U.S.C. § 1307, hereby response to the Motion to Dismiss ("Motion") filed by the Chapter 13 trustee, and in support thereof, state:

1. On November 20, 2023 (the “Petition Date”), the Debtors filed a Voluntary Petition under Chapter 13 of the Bankruptcy Code, commencing in this Court in Case No. 23-18435.
2. Timothy P. Branigan was appointed Chapter 13 trustee in this matter.
3. On May 28, 2024, this Court entered an order confirming the Debtors' Chapter 13 plan.
4. May 2, 2024, the Comptroller of Maryland filed a proof of claim. In its Claim, the Comptroller alleges that the Debtors owe \$16,098.00, \$15,429.00 of which is priority.
5. On July 22, 2024, the Debtors filed an Objection to the Comptroller's claim. ECF No.: 31.
6. Resolution of this objection is necessary to determine if the Comptroller has a valid claim.
7. There is no unreasonable delay that is prejudicial to any creditor pursuant to 11 U.S.C. § 1307(c)(1).

WHEREFORE, Ernest L. Hollins, Jr. and Appeakrong Boakye Debtors, respectfully request that this Court deny the Motion.

Respectfully submitted,

/s/ Eric S. Steiner

Eric S. Steiner, Esquire

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 22nd day of July, 2024, a true and correct copy of the foregoing was served via the Court's CM/ECF system to:

Timothy P. Branigan
Chapter 13 Trustee

I FURTHER CERTIFY that on this 22nd day of July, 2024, a true and correct copy of the foregoing was sent via first class mail, postage prepaid, to:

Comptroller of the Treasury
Compliance Division, Room 409
301 W. Preston Street
Baltimore, MD 21201

Comptroller of Maryland
c/o Andrew John Henslee
301 W. Preston Street
Baltimore, MD 21201

Maryland Attorney General
200 St. Paul Place
Baltimore, Maryland

Comptroller of/Maryland
c/o Brooke E. Lierman
P. O. Box 466
Goldstein Treasury Building
80 Calvert St.
Annapolis, MD 21404 - 0466

/s/ Eric S. Steiner

Eric S. Steiner